

Duke, Daphne

From: PSC_Contact
Subject: FW: APPEAL TO DIRECTIVE ISSUED 1/13/2022 FOR DOCKET NO 2021-340-T
Attachments: Signed appeal to PSC-ORS.pdf

From: Kenneth Truelove <Kenneth.Truelove@chhj.com>
Sent: Tuesday, January 25, 2022 8:08 AM
To: PSC_Contact <contact@psc.sc.gov>
Cc: Huber, Christopher <chuber@ors.sc.gov>; Besley, Sharon <sharon.besley@psc.sc.gov>; Rhaney, Donna L <DRhaney@ors.sc.gov>; Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>
Subject: [External] APPEAL TO DIRECTIVE ISSUED 1/13/2022 FOR DOCKET NO 2021-340-T

To all concerned parties:

An appeal to the directive issued 13 January 2022 is attached to this email. Please upload to the DMS.

Please let us know if additional information is required.

Kind regards,



Ken Truelove

Owner

College HUNKS Hauling Junk & Moving | Greenville/Anderson,
 SC

843.499.1798 | Kenneth.Truelove@chhj.com | chhj.com



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January 24, 2022

Public Service Commission of South Carolina:

The following is intended to serve as an official Appeal to the Public Service Commission of South Carolina Commission Directive for Docket No. 2021-340-T dated January 13, 2022. As such, we will be operating under the impression that any submission deadlines and or adjustment directives are assumptively stayed until this appeal can be properly heard.

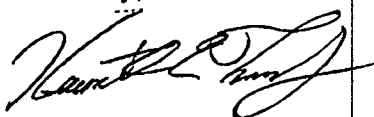
We do not believe directing us to change our tariff and bill of lading to a 30-day period is just or reasonable for the following reasons:

- No minimum claim period currently exists for Class E Household Goods Movers in the State of South Carolina.
- Requiring us to change our tariff would be inconsistent with established operational industry precedence.
- In addition to 7 days or less being the majority and historical norm, recent requests by others to set their claim period at this reasonable and rational benchmark have been approved. Requiring us to deviate from the norm, in the absence of a claim mandate uniformly applied industry wide, is arbitrarily and unduly burdensome and may result in a competitive disadvantage. Evidenced by:
 - The SC tariffs for our largest competitor, Two Men and a Truck, require customers report damages within 96 hours after a move.
 - More than half of the Tariffs approved in 2021 require less than 30 days for a reporting period; the majority of which were 7 days or less.
- Prior to this directive, our bill of lading stated a customer had 7 days and our tariff stated 30 days. Part of the proposed tariff change was made to address this inconsistency. We have been operating with this inconsistency in our paperwork for 3 years and there have been no complaints to the Office of Regulatory Staff regarding the claim reporting period.

- Most imperatively, there is a relationship between insurance "coverage" and the shorter time frame. We consulted with our general liability insurance provider and found that claims can be presented at any time; however, our agent assures us the longer we wait to file a claim, the more likely it is to be denied. The argument from the insurance company is why was this not reported sooner? Also, how do we know the damage didn't occur when the client unpacked the item? Our liability is with items we packed or wrapped and those are usually opened or unwrapped the same day as the move.

Approving the proposed tariff changes will bring our bill of lading and tariff into agreement and be consistent with the claim process used by other Class E Household Good Movers in South Carolina. For all the aforementioned reasons, we respectfully request the Public Service Commission of South Carolina approve all parts of our proposed tariff.

Sincerely,



Kenneth E. Truelove, Jr
Franchise Owner